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**From:** Messina, Edward [Messina.Edward@epa.gov]  
**Sent:** 4/14/2021 7:53:11 PM  
**To:** Ozmen, Shamus [Ozmen.Shamus@epa.gov]; Nesci, Kimberly [Nesci.Kimberly@epa.gov]  
**CC:** Goodis, Michael [Goodis.Michael@epa.gov]; Layne, Arnold [Layne.Arnold@epa.gov]; Siedschlag, Gregory [Siedschlag.Gregory@epa.gov]; Dinkins, Darlene [Dinkins.Darlene@epa.gov]; Lara, Rhina [Lara.Rhina@epa.gov]; Cyran, Carissa [Cyran.Carissa@epa.gov]; Widawsky, David [Widawsky.David@epa.gov]; Helfgott, Daniel [Helfgott.Daniel@epa.gov]  
**Subject:** RE: OPP IO review: another set of state questions regarding PFAS in Pesticide Packaging

OK with me. Kimberly?

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Ed Messina, Esq.  
Acting Office Director  
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**From:** Ozmen, Shamus <Ozmen.Shamus@epa.gov>  
**Sent:** Wednesday, April 14, 2021 3:51 PM  
**To:** Messina, Edward <Messina.Edward@epa.gov>; Nesci, Kimberly <Nesci.Kimberly@epa.gov>  
**Cc:** Goodis, Michael <Goodis.Michael@epa.gov>; Layne, Arnold <Layne.Arnold@epa.gov>; Siedschlag, Gregory <Siedschlag.Gregory@epa.gov>; Dinkins, Darlene <Dinkins.Darlene@epa.gov>; Lara, Rhina <Lara.Rhina@epa.gov>; Cyran, Carissa <Cyran.Carissa@epa.gov>; Widawsky, David <Widawsky.David@epa.gov>; Helfgott, Daniel <Helfgott.Daniel@epa.gov>  
**Subject:** RE: OPP IO review: another set of state questions regarding PFAS in Pesticide Packaging

Building on Kimberly's suggestions, perhaps we can elaborate on the other action as stated in the [March press release](#) (see additional language in grey):

- 1) **Q: Mixed messages between the Ft. Meade lab stating they need more data to draw any conclusions regarding PFAS coming from the container vs. action being taken on the containers and targeting them as the source of the PFAS.**

Testing indicates that PFAS were most likely formed from a chemical reaction during the container fluorination process and then leached into the pesticide product. The agency is also testing different brands of fluorinated containers to determine whether they contain and/or leach PFAS, and if so, learn the conditions affecting leaching.

EPA is aware that many companies are using fluorinated HDPE containers to store and distribute pesticide and other products. EPA is actively working with the Food and Drug Administration, the U.S. Department of Agriculture, and industry and trade organizations to raise awareness of this emerging issue and discuss expectations of product stewardship. EPA is coordinating with the Ag Container Recycling Council, the American Chemistry Council, Crop Life America, the Household & Commercial Products Association, and the National Pest Management Association.

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**From:** Messina, Edward <Messina.Edward@epa.gov>  
**Sent:** Tuesday, April 13, 2021 5:45 PM  
**To:** Nesci, Kimberly <Nesci.Kimberly@epa.gov>  
**Cc:** Ozmen, Shamus <Ozmen.Shamus@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Layne, Arnold <Layne.Arnold@epa.gov>; Siedschlag, Gregory <Siedschlag.Gregory@epa.gov>; Dinkins, Darlene <Dinkins.Darlene@epa.gov>; Lara, Rhina <Lara.Rhina@epa.gov>; Cyran, Carissa <Cyran.Carissa@epa.gov>; Widawsky, David <Widawsky.David@epa.gov>; Helfgott, Daniel <Helfgott.Daniel@epa.gov>  
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Ok

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On Apr 13, 2021, at 5:40 PM, Nesci, Kimberly <Nesci.Kimberly@epa.gov> wrote:

## Ex. 5 Deliberative Process (DP)

Also, looping in Dan and David, as they're investigating containers outside of the pesticide supply. (Thanks, OPPT!)

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**From:** Messina, Edward <Messina.Edward@epa.gov>  
**Sent:** Tuesday, April 13, 2021 5:03 PM  
**To:** Ozmen, Shamus <Ozmen.Shamus@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Layne, Arnold <Layne.Arnold@epa.gov>  
**Cc:** Siedschlag, Gregory <Siedschlag.Gregory@epa.gov>; Dinkins, Darlene <Dinkins.Darlene@epa.gov>; Lara, Rhina <Lara.Rhina@epa.gov>; Cyran, Carissa <Cyran.Carissa@epa.gov>; Nesci, Kimberly <Nesci.Kimberly@epa.gov>  
**Subject:** RE: OPP IO review: another set of state questions regarding PFAS in Pesticide Packaging

## Ex. 5 Deliberative Process (DP)

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**From:** Ozmen, Shamus <[Ozmen.Shamus@epa.gov](mailto:Ozmen.Shamus@epa.gov)>

**Sent:** Tuesday, April 13, 2021 4:57 PM

**To:** Messina, Edward <[Messina.Edward@epa.gov](mailto:Messina.Edward@epa.gov)>; Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>; Layne, Arnold <[Layne.Arnold@epa.gov](mailto:Layne.Arnold@epa.gov)>

**Cc:** Siedschlag, Gregory <[Siedschlag.Gregory@epa.gov](mailto:Siedschlag.Gregory@epa.gov)>; Dinkins, Darlene <[Dinkins.Darlene@epa.gov](mailto:Dinkins.Darlene@epa.gov)>; Lara, Rhina <[Lara.Rhina@epa.gov](mailto:Lara.Rhina@epa.gov)>; Cyran, Carissa <[Cyran.Carissa@epa.gov](mailto:Cyran.Carissa@epa.gov)>; Nesci, Kimberly <[Nesci.Kimberly@epa.gov](mailto:Nesci.Kimberly@epa.gov)>

**Subject:** OPP IO review: another set of state questions regarding PFAS in Pesticide Packaging

For your review is another set of answers to questions submitted by the states/SFIREG.



## Ex. 5 Deliberative Process (DP)

- 1) **Q: Mixed messages between the Ft. Meade lab stating they need more data to draw any conclusions regarding PFAS coming from the container vs. action being taken on the containers and targeting them as the source of the PFAS.**

## Ex. 5 Deliberative Process (DP)

- 2) **Q: What containers are being purchased off the open market for additional testing by BEAD/Ft. Meade and are they the same level of fluorination as the initial container rinsate testing? If not, is there reason similar containers are not being used to perform the leaching studies?**

The BEAD/Ft Meade lab is currently performing leaching studies on several brands. The levels of fluorination and the fluorination companies of the containers are currently unknown.

The lab is planning to add additional containers to the testing queue when they are available for purchase, as they are currently out of stock. The lab is not testing similar containers as those used initially in the rinsate testing because it is unknown which containers are fluorinated by the same company as the containers that were initially tested.

- 3) **Q: Are there continued considerations being given regarding SLA laboratories providing analytical support? If so, what are they?**

EPA is actively communicating with state partners and their laboratories. For state laboratories interested in sharing samples, we encourage them to reach out to the BEAD/Ft. Meade lab to discuss laboratory equipment requirements.

- 4) **Q: What consideration, if any, is being given to pesticide container recycling programs in regards to the fluorinated HDPE containers?**

EPA has been in contact with the Ag Container Recycling Council. We will work together to provide guidance to states and localities regarding pesticide container recycling programs.

5) **Q: EPA Methods 537.1 and 533 are established and being used with some differences between them. What methodology would be appropriate for testing?**

Both EPA Method 537.1 and 533 are appropriate for testing for PFAS. However, since the current EPA methods are for water samples, sample preparation procedures need to be modified. The Ft. Meade lab is validating a method for detecting PFAS in an oily matrix and will share the method when it is available.